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Carol Hanlon, Office of Civilian Radioactive waste Management, Department of Energy
Carol Hanlon, U.S. Department of Energy, Yucca Mountain Site Characterization Office, (M/S
#025), P.O. Box 30307, North Las Vegas, Nevada 89036-037

Dear Carol Hanlon, Office of Civilian Radioactive waste Management, Department of Energy:

This letter is in response to the Department of Energy's call for comments regarding the Yucca Mountain Nuclear waste facility in Nevada. The aim of this letter is to express support for the idea of a centralized nuclear waste storage program, while also pointing out potential problems and concerns, both legal and political, regarding rushed characterization of such a site.

First I would like to express my support for the existence of a central nuclear waste storage facility. As the nuclear power industry currently stands, most of the nuclear waste in the United States is stored on site at the particular plant where it was produced. This method of storage creates a huge increase in the possibility of waste being mishandled. It seems obvious that if there are one hundred different storage facilities there is more potential for danger than if there were just one. Another factor that, in my opinion, adds to the possibility of mishandling is the physically decentralized processing/storage of the nuclear waste. Decentralized management of nuclear waste increases the possibility of mishandling going unnoticed because the sites are less visible to the public eye. A single location for the storage of waste would make the facility's operation much more high profile, thus leading to more accountability and safer management.

The next question is whether or not Yucca Mountain is the best possible site for the storage of nuclear waste. The Yucca Mountain Preliminary Site Suitability Evaluation released by the Department of Energy tends to suggest that it is. The report states that the Yucca Mountain site "would be unlikely to be disrupted by volcanoes, earthquakes, erosion, or other geologic occurrences for tens of thousands of years or more." The report goes on to outline numerous storage, security, and protection plans to help guarantee that the Yucca Mountain site will remain safe. It almost seems as though the powers that be have come to a foregone conclusion that the Yucca Mountain site is the best place to store nuclear waste, and now is the time to do it. It almost seems as though the report is nothing more than a persuasive argument in support of the site. The fact that Congress amended the NWPA in 1987 to designate Yucca Mountain as the only site to be considered for waste storage, and directed the Department of Energy to terminate site-specific activities at the two other sites that had been recommended for waste storage seems only to solidify this thought. The amendments seem to be an "our way or the highway" approach to site characterization that will likely only lead to more public disapproval and dissatisfaction regarding the selection of the Yucca Mountain site.

The issue of storage extends far beyond the boundaries of the Yucca Mountain site. The transportation of the nuclear waste makes a centralized storage facility a national concern. 42 U.S.C. 4321, regarding the national environmental policy, sets forth an agenda to "encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man". The Yucca Mountain project must promote this declaration of purpose to be allowed. In some ways the very nature of the Yucca Mountain program seems to directly contravene 42 U.S.C. 4321. It may actually promote damage to the environment and humans rather than protect them. The main crux of this argument is

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based on the transportation of nuclear waste to the Yucca Mountain site. In order for the Yucca Mountain site to actually be used nuclear waste must arrive there somehow from outside reactors. To transport the waste the waste must be put into the casks to encase it as it is transported. These casks are designed to limit radiation and protect the waste in case of a shipping accident. Unfortunately, these casks are yet to be fully developed. Further, the casks are not required to be physically tested at all before use, and data for the reliability of the proposed casks is based on computer generated disasters and data from as far back as 1980. Federal regulations allow the shipping casks to emit radiation equivalent to about one chest x-ray per hour of exposure for someone in close proximity to the casks. No testing has been completed to determine the effects of this radiation on truck and train drivers, or to people in nearby cars, that may be exposed to this leakage for long periods of time. Transportation Advisor Robert Halstead testified to the Nevada Legislature: "From a transportation standpoint, it would be difficult for the federal government to have proposed a more problematic site for a repository than Yucca Mountain. The site lacks rail access, has limited road access, and is effected by unique local conditions that increase both the radiological risks and perceived risks of nuclear waste transportation." This statement further exemplifies the Department of Energy's haste in the selection of the Yucca Mountain site, and raises serious questions about what should be, and needs to be, done. Economic and safety concerns must be seriously considered before rushing into a potentially dangerous and expensive operation. At this point it may be bit to late to try and prevent the use of the Yucca mountain site, but the issue regarding transportation of nuclear waste should still be open to debate. Though the Department of Energy was successful in its push for the use of Yucca Mountain through their use statutory amendments to site characterization, and a focused agenda I don't think the same sort of approach should be allowed for the transportation issues involved with the project.

Though the ultimate goal of a centralized storage facility has merit, at this point the project is still too under developed and under researched to go forward at this time. Recent horrific occurrences in our country only lend to the idea that caution at all times should be utilized to prevent great tragedy. To proceed with the project at this time would be politically, financially, and logically unsound. Only when there is total assurance that the Yucca Mountain site is the best place for waste storage, and transportation to that site is both safe and economically efficient, should the project commence. This assurance is necessary both for safety and for public perception regarding the use of Yucca Mountain.

Sincerely, Patrick Wellnitz